

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Renee B Entress**

Debtor

Case No. **15-12828**

Chapter **13**

OBJECTION TO CERTIFICATION OF DEFAULT

1. On November 30, 2017, Creditor Quicken Loans, Inc. certified that the Debtor defaulted in fulfilling her obligations under the Stipulation and Order filed at document 22.
2. There was no default and proof of payments was sent to Creditor's attorney on November 24, 2017 and again on November 30, 2017 following the filing of the Creditor's certification.

WHEREFORE, debtor respectfully requests that the relief requested by the Creditor be denied and an Order be entered sanctioning the Creditor.

Date **November 30, 2017**

Signature **/s/ Renee B Entress**

Renee B Entress

Debtor

Attorney **/s/ Richard N Lipow**

Richard N Lipow

CERTIFICATE OF SERVICE

The undersigned certifies to the Court that a true and correct copy of the foregoing was electronically served on the creditor's counsel, the Chapter 13 and US Trustees at the time of the document was filed.

/s/ Richard N Lipow
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